

Exhibit A



Christopher Szewczyk <cjs@mkpvlaw.com>

Stoud v. Susquehanna County

Gerard M. Karam <gmk@mkpvlaw.com>
To: Jaime Hailstone <jhailstone@kbh-law.com>
Cc: Christopher Szewczyk <cjs@mkpvlaw.com>

Thu, Jul 23, 2020 at 10:03 AM

Dear Jamie, I am sure you are aware of the lawsuit Michael Giangrieco has filed against Susquehanna County and Elizabeth Arnold. For your convenience I attach a copy hereto. Paragraphs 11, 12 and 15-18 deal with allegations of Elizabeth Arnold providing false reports to County's Insurance Company and the Insurance company's attorney as it relates to the EEOC complaints of Robert Stoud and Maggie Macnamara. These false reports in turn caused a false filing to be made with the governmental agency. Attorney Giangrieco goes on to allege that he and other county employees were asked to lie regarding the governmental filing in order to protect Elizabeth Arnold.

Given the seriousness and significance of these newly discovered allegations we feel we are entitled to conduct additional discovery that would be limited to the allegations contained in the recent complaint filed by Attorney Giangrieco. The discovery could easily be done so as not to delay the September 28, 2020 trial date. We anticipate deposing Elizabeth Arnold, the Insurance Company attorney in question and Attorney Giangrieco. Given the nature these allegations and knowing the questions to be asked of Ms. Arnold we would like Ms. Arnold to know that she is entitled to have her own separate counsel at the deposition in addition to insurance company counsel.

We anticipate filing on Tuesday morning July 28th a Motion for Allowance of Additional Discovery with the court. The motion will include a copy of Attorney Giangrieco's complaint and factual assertions consistent with the above two paragraphs. We are requesting your concurrence in this motion. We are open to discuss any limitations or concerns you have. If we do not hear from you by 5:00 PM on Monday July 27, 2020 we will assume that you do not concur in our motion. Hope to hear from you, Jerry

Gerard M. Karam

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